

Eric A. Liepins
ERIC A. LIEPINS, P.C.
12770 Coit Road
Suite 1100
Dallas, Texas 75251
Ph. (972) 991-5591
Fax (972) 991-5788
PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

| | | |
|----------------------|---|----------------------|
| IN RE | § | |
| | § | |
| HARD-MIRE RESTAURANT | § | |
| HOLDINGS, LLC | § | |
| | § | Case no. 18-31575-11 |
| DEBTOR | § | |

DEBTOR'S OBJECTION TO PROOF OF CLAIM 6

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION OR REQUEST FOR HEARING IS FILED WITH THE UNITED STATES BANKRUPTCY CLERK, 1100 COMMERCE STREET, 12TH FLOOR, DALLAS, TEXAS 75242, WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF THE FILING OF THIS MOTION, UNLESS THE COURT, SUA SPONTE, OR UPON TIMELY APPLICATION OF A PARTY IN INTEREST, SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION OR REQUEST FOR HEARING.

IF NO OBJECTION OR REQUEST FOR HEARING IS TIMELY FILED, THE MOTION SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. THE COURT RESERVES THE RIGHT TO SET ANY MATTER FOR HEARING.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Hard Mire Restaurant Holdings, LLC ("Hard Mire") Debtor in the above styled and numbered cause and files this its Objection to Proof of Claim 6 filed by Jose Dominguez ("Dominguez") and in support thereof would respectfully show unto the Court as follows:

1. The Debtor filed its voluntary Petition on May 4, 2018. Since that time the Debtor

has continued to operate its business as a debtor-in-possession.

2. The Debtor's business consists of the ownership of a restaurant in Dallas, Texas.
3. Proof of claim 6 filed by Dominguez asserts a claim for \$101,253.75.
4. Debtor would show this claim is for an asserted violation of the Fair Labor Standards Act.
5. The Debtor denies that any violation of the Fair Labor Standards Act occurred as to Mr Dominguez.
6. The Debtor objects to claim of Dominguez until this court makes a determination of the amount if any owed to Dominguez.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully prays that the Court set this matter for an hearing and that upon final hearing hereon the Court enter an Order sustaining the Objection and allowing Proof of claim 6 of Dominguez in the amount of \$0 and for such other and further relief in law or in equity to which the Debtor may show itself justly entitled.

Respectfully submitted,

Eric A. Liepins
Eric A. Liepins, P.C.
12770 Coit Road
Suite 1100
Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - telecopier

By: /s/ Eric Liepins
Eric A. Liepins, SBN 12338110
ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Objection was sent to Jose Dominguez, c/o Robert Manteuffel, 6310 LBJ Freeway, Suite 112, Dallas, Texas 75240 on this the 11th day of March 2019.

/s/ Eric Liepins
Eric Liepins